

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

SINGULAR COMPUTING LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 1:19-cv-12551-FDS

Hon. F. Dennis Saylor IV

**DECLARATION OF DR. SUNIL KHATRI IN SUPPORT OF  
PLAINTIFF’S OPPOSITION TO THE MOTION OF DEFENDANT FOR  
SUMMARY JUDGMENT OF NON-INFRINGEMENT**

I, Dr. Sunil Khatri, hereby declare as follows:

1. I have been retained by plaintiff, Singular Computing LLC (“Singular”), as an expert witness in this case. I submit this declaration in support of Singular’s opposition to the motion of defendant, Google LLC, for summary judgement of non-infringement.

2. I intend to testify at trial of this case in accordance with the statements and opinions set forth in my Expert Report dated December 22, 2022 and my Rebuttal Expert Report dated March 3, 2023.

3. The statements and opinions set forth in my Expert Report and my Rebuttal Expert Report are true and accurate to the best of my knowledge.

4. Attached hereto as Exhibit 1 is a true and correct copy of my Expert Report in this case dated December 22, 2022.

5. Attached hereto as Exhibit 2 is a true and correct copy of my Rebuttal Expert Report in this case dated March 3, 2023.

Executed under the pains and penalties of perjury at College Station, Texas  
on May 18, 2023.



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Sunil Khatri, Ph.D.